PEGGY A. DICKINSON PRESIDENT



VICE-PRESIDENT STANLEY BEAN PLANT SUPERVISOR

STEPHANIE JACKSON

POST OFFICE BOX 577 RAGLAND, ALABAMA 35131 205-472-2141 FAX 205-472-2145

> EB 06-36 EB-06-TC-060

CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006

February 6, 2006

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12th Street S.W. Washington, D.C. 20554

Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, as revised by Public Notice issued on February 2, 2006, please find attached our company's submission in response to the Enforcement Bureau's request for the most recent period citing the requirements of § 64.2009(e) of the Commission's Rules.

Should you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,

Ragland Telephone Company, Inc.

Peggy Dickinson

President

Bryon McCoy via e-mail byron.mccoy@fcc.gov cc:

Best Copy and Printing, Inc., via e-mail fcc@bcpiweb.com

Before the Federal Communications Commission Washington, D.C. 20554

Certification of CPNI FILING FEBRUARY 6, 2006 OF RAGLAND TELEPHONE COMPANY, INC.

EB-06-TC-060 EB Docket No. 06-36

TO: FEDERAL COMMUNICATIONS COMMISSION, ENFORCEMENT BUREAU

In response to the Commission's Public Notice, DA 06-223 (released January 30, 2006), and revised by Public Notice, DA 06-258 (released February 2, 2006), Ragland Telephone Company, Inc. ("Ragland") states as follows:

- 1. As a small rural carrier with less than one thousand five hundred (1,500) total access lines, Ragland ensured that it was in compliance with the FCC rules contained in the subpart addressing Customer Proprietary Network Information ("CPNI") for 2005 in that Ragland did not use CPNI in its marketing efforts in 2005 nor did it turn over CPNI to others in 2005.
- 2. Because Ragland was not using CPNI in its marketing efforts and did not turn over CPNI to others, Ragland certifies that it complied with the Commission's rules regarding the proper use of CPNI.
- 3. Ragland's interpretation of 47 C.F.R. § 64.2009, entitled "Safeguards required for use of customer proprietary network information" was that so long as CPNI was not used by telecommunications carriers, the compliance certificate requested by the Enforcement Bureau in Public Notice DA 06-223, and revised by Public Notice, DA 06-258, was not required. Specifically, that Section provides, among other things, that a carrier "must implement a system...prior to the use of CPNI..." 47 C.F.R. § 64.2009(a). For that reason, Ragland does not have a compliance certificate for the year 2005.
- 4. Ragland will immediately adopt an appropriate 2006 compliance certificate in the event that CPNI is later used.

Ragland Telephone Company, Inc.

Peggy Dickinson Its: President